



## HAMRA LAW GROUP, PC.

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October 27, 2021

**VIA ECF**

Hon. Mary Kay Vyskocil  
US Magistrate Judge  
US Courthouse – SDNY  
500 Pearl Street  
New York, NY 11201

USDC SDNY  
DOCUMENT  
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**Re: *Barone, et al. v. Campania Felix, LLC***  
**Case No.: 1:20-cv-06709-MKV**

### **STATUS LETTER & MOTION OF EXT. OF TIME TO COMPLETE DISCOVERY**

To Your Honor,

This office represents Defendants in the above-captioned action and write jointly with Plaintiff's to give an update on the case status and to request an extension of the time to complete discovery.

Per the Court's order on October 14, 2021, the Parties are writing to explain why the Parties should not be sanctioned for failure to respond to the previous orders of the Court regarding the status letter which was due on October 12, 2021.

In the first, Defendants' office has not received many of the notifications from the Clerk regarding filings and deadlines, including the undersigned and our paralegal as well. It appears from our records that we did not get the bounce from June 4, 2021 nor the one from October 14, 2021. Defense counsel only noticed the most recent order from your Honor after a file review. In speaking to Plaintiff's current counsel, Khalil Huey, Esq. (copied via email and the ECF), it appears his office has only received the bounce from October 14, 2021.

Additionally, as counsel of record for Plaintiffs' has changed from time to time, the Parties have had some issues communicating regarding the completion of discovery. At this time, the demands have been served and the Parties wish to request a single and final opportunity to complete discovery and conduct depositions. Neither party wishes to abandon their case or defenses and have participated in mediation, though unsuccessfully.



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In accordance with this request, the Parties' propose that the time to complete discovery be extended to December 16, 2021, with depositions to be completed by December 2, 2021. As such, the Parties also make an application to adjourn the post-discovery conference scheduled for November 19, 2021 until a time convenient for the Court after the proposed deadline of December 16, 2021.

The Parties extend their sincere apologies for the law office failures and issues caused in receiving the bounces in this action, which caused a cascade of issues in calendaring the appropriate deadlines and responding to the Court in a timely fashion.

The Parties and respective counsel thank the Court for its time and consideration in this matter.

*Kevin Johnson*  
Kevin S. Johnson, Esq.  
HAMRA LAW GROUP, P.C.  
*Attorneys for Defendant*

**GRANTED. The deadline for the completion of fact discovery shall be extended to December 16, 2021. The post-discovery conference scheduled for November 19, 2021 at 11:00 AM is ADJOURNED to January 11, 2022 at 11:00 AM. On or before January 4, 2021, the parties shall submit a joint letter regarding the status of the case as required by the Civil Case Management Plan and Scheduling Order filed at ECF No. 37. Failure to comply with the deadlines set forth herein may result in sanctions, including preclusion at trial of information not provided or dismissal of claims or defenses. SO ORDERED.**

Date: 10/27/2021  
New York, New York

*Mary Kay Vyskocil*  
Mary Kay Vyskocil  
United States District Judge